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Advancing the independence of people with disabilities

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In the Matter of the Telecommunications Relay Services)
And Speech-to Speech Services for Individuals with) CC Docket No. 98-67
Hearing and Speech Disabilities)

Comments of United Cerebral Palsy Associations, Inc.

INTRODUCTION

United Cerebral Palsy Associations, Inc. (UCPA) is one of the largest national nonprofit organizations dedicated to the fostering of independence and opportunity for people with all disabilities. Operating through a network of local and state affiliates, as well as through a number of national projects, UCPA maintains contact with a large number of people with various disabilities in all parts of the nation and of every age, level of education and socio-economic status.

UCPA is grateful for the opportunity of submitting these comments to the Federal Communications Commission (FCC). We believe that our history of commitment and involvement in the area telecommunications access have enabled us to develop an expertise that should prove of value here. We also believe that our extensive contacts and relationships with Americans with disabilities enable us to offer meaningful insights into many of the difficult balances the Commission must strike between what would be uniformly desirable in an ideal world and what is readily achievable with Speech-to-Speech (STS). Our comments will specifically address STS services.

COMMENTS

1. Many consumers and potential consumers **will** be unable to respond to this Notice of Proposed Rulemaking (NPRM) because of the nature of their multiple disabilities. Please do not take the lack of response as a lack of interest.
2. We would like to stress the importance that STS is only one option in telecommunications for individuals with speech disabilities. Many individuals prefer to use the regular voice telephone system.

3. The Commission concludes that STS relay services are "telecommunications relay services" (TRS) within the meaning of Title IV of the ADA (47 U.S.C. 225) and that the definition of "TRS" should be expanded to encompass this service.

As Title IV of the ADA is applicable to any wire or radio communication service that enables individuals with speech disabilities to engage in communication with individuals without such disabilities and is not limited to services using TTY's, we fully support the Commission's conclusion that STS services also fall under this definition of "telecommunications relay services." STS is a telephone transmission service that enables an individual with speech disabilities to communicate by wire or radio with another person, in a manner that is functionally equivalent to the ability of a person who does not have a speech disability.

4. The Commission proposes that, within two years of the publication of the Report and Order in this proceeding, common carriers providing voice transmission service must ensure that nationwide STS services are available to users with speech disabilities throughout their service area.

We fully agree with the Commission's decision to require nationwide STS services within two years of the final rules.

5. Although multilingual relay services are a covered TRS under Title IV of the ADA, the NPRM does not propose to require MRS.

We recommend that the Commission mandate MRS while giving the TRS program administrators the authority to decide the various languages offered depending on state language needs and population demographics.

6. The Commission seeks comment on issues concerning access to emergency services through STS.

We fully support access to emergency services through STS, but we believe that STS should be one option for individuals with speech disabilities. Individuals with speech disabilities should be afforded the option to use the regular voice telephone 9 11 system.

7. The NPRM proposes a number of rule changes and clarifications intended to improve the "functional equivalency" of the TRS service.

While the length of time that elapses from the time the communications assistant (CA) answers the inbound call and when the outbound call begins may be prolonged because of speaking time, we recommend that quality control standards, such as speed in answering calls should be the same as for TTY relay.

We believe there is no reason to relax the speed of answer time required for inbound calls.

We also would recommend the following:

- 1) Users should not have to endure noticeable volume changes during a call, echoes, unwanted disconnect, problems reaching **800#s**, etc. Vendors must provide a consistently high quality of software, hardware, and other communications devices including lines, connection between lines, area codes, etc. STS vendors must provide consistent, reliable, high-quality connections, adequate volume, voice transmission, and all other elements of telephonic telecommunications which individuals without disabilities enjoy with standard telephone communication systems.
 - 2) The vendor will provide the state with monthly STS-call volume data consistent with data collection criteria outlined by FCC.
 - 3) All services and practices offered to TTY relay users and their callers will be offered to STS users and their callers in a manner appropriate to their use.
 - 4) While STS may have operational differences that make compliance with all current Commission standards for TTY relay infeasible, a panel of consumers and providers should be convened to determine the appropriateness of compliance with each standard.
8. The Commission seeks comment on the issue of "multivendoring," the practice of allowing several TRS vendors to compete directly for consumers in a state for their intrastate TRS calling needs.

We would recommend that the Commission endorse the practice of multivendoring. It is our belief that competition is especially important in providing quality STS.

9. Although the NPRM does not address specific Communications Assistant (CA) standards at this time, we would recommend the following:
- 1) All CAs and supervisors who take STS calls must thoroughly understand and respect the Speech-to-Speech protocols, requirements, and philosophy.
 - 2) As part of his/her training every CA must take part in a training by a speech disabilities professional or consumer expert. STS CA training must include introduction to various technologies used by consumers to communicate including voice synthesizers. Training must include introduction to many speech disabilities. Some training may be provided by videotape.

3) **CAs** must be fluent in English, able to speak English without a distortion accent. **CAs** will be tested for hearing acuity, speech comprehension, and English language skills including vocabulary, grammar, and syntax. This will apply to English and all other languages offered to STS users. National standards must be developed in order to ensure consistent performance and practice by each vendor and their employees.

10. We would like to address some state-specific issues, including the following:

1) The state relay advisory committee must include a representative of the Speech Disability Community who is a STS user.

2) Each state will assign at least a one quarter-time person who is either a knowledgeable consumer or has at least one year of training in speech disability to monitor STS service quality and insure that the vendor abides by the contract. This person could also be employed to perform STS outreach.

11. We would specifically like to comment on outreach to the speech disability community. It is our recommendation that funds are allocated within the Relay service contracts specifically for outreach to the speech disability community who are the most isolated in rural towns, etc.

12. Finally, we believe it is imperative to comment on ways that STS must differ from TTY relay, including the following:

1) Speech-to-Speech should have its own separate 800 number (separate from the TTY relay number). Only one STS number is necessary for each state. Eventually, there should be one national Speech-to-Speech number.

2) User assistance (such as STS customer service staff and complaint resolution personnel) must have the resources necessary to provide services to STS users (by voice) of the same quality available to other users. Customer service staff will have comprehensive training and knowledge and access to written policy and procedure manuals employed by STS staff.

3) The STS standards should deviate from those of TRS in the definition of confidentiality. While general confidentiality is vital, confidentiality should not be defined as specifically for STS as for TTY relay. FCC could convene such a consumer board to study this issue.